

## Danny Shadid

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**From:** Tianna Mays <tmays@lawyerscommittee.org>  
**Sent:** Friday, February 16, 2024 4:29 PM  
**To:** Danny Shadid; Jason Leckerman; cpowell@spencerfane.com; 'Ferate, AJ'; Arthur Ago  
**Cc:** Amber@Shadidlaw.com; 'steve haynes'  
**Subject:** RE: KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

Danny,

Plaintiffs' position is that you should file your client's document separately.

Best,  
Tianna

### Tianna J. Mays

Associate Director, Criminal Justice Project  
Lawyers' Committee for Civil Rights Under Law  
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**From:** Danny Shadid <danny@shadidlaw.com>  
**Sent:** Friday, February 16, 2024 4:40 PM  
**To:** Jason Leckerman <leckermanj@ballardspahr.com>; cpowell@spencerfane.com; 'Ferate, AJ' <AJFerate@spencerfane.com>; Tianna Mays <tmays@lawyerscommittee.org>; Arthur Ago <aago@lawyerscommittee.org>  
**Cc:** Amber@Shadidlaw.com; 'steve haynes' <judgehaynes@gmail.com>  
**Subject:** RE: KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

[EXTERNAL EMAIL] This email originated outside the organization. Do not click any links or open any attachments unless you can verify the legitimacy.

Well, the Court said to file one document. If you want me to file it separately, I will do so. Just let me know.

Danny

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Oklahoma City, OK 73118  
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Mobile: (405) 210-8802



E: [Danny@Shadidlaw.com](mailto:Danny@Shadidlaw.com)

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From: Leckerman, Jason <[LeckermanJ@ballardspahr.com](mailto:LeckermanJ@ballardspahr.com)>

Sent: Friday, February 16, 2024 2:12 PM

To: Danny Shadid <[danny@shadidlaw.com](mailto:danny@shadidlaw.com)>; [cpowell@spencerfane.com](mailto:cpowell@spencerfane.com); 'Ferate, AJ' <[AJFerate@spencerfane.com](mailto:AJFerate@spencerfane.com)>;  
Tianna Mays <[tmays@lawyerscommittee.org](mailto:tmays@lawyerscommittee.org)>; Arthur Ago <[aago@lawyerscommittee.org](mailto:aago@lawyerscommittee.org)>

Cc: [Amber@Shadidlaw.com](mailto:Amber@Shadidlaw.com)

Subject: RE: KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

I'm copying in co-counsel for the plaintiffs. Any reason you shouldn't just submit this separately?

Jason

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From: Danny Shadid <[danny@shadidlaw.com](mailto:danny@shadidlaw.com)>

Sent: Friday, February 16, 2024 1:34 PM

To: [cpowell@spencerfane.com](mailto:cpowell@spencerfane.com); 'Ferate, AJ' <[AJFerate@spencerfane.com](mailto:AJFerate@spencerfane.com)>; Leckerman, Jason  
<[LeckermanJ@ballardspahr.com](mailto:LeckermanJ@ballardspahr.com)>

Cc: 'steve haynes' <[judgehaynes@gmail.com](mailto:judgehaynes@gmail.com)>; [Amber@Shadidlaw.com](mailto:Amber@Shadidlaw.com)

Subject: RE: KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

 **EXTERNAL**

Counsel:

Attached is Judge Haynes' portion of the Joint Motion to be filed today. I have labeled it "Response and Position Statement of Judge Stephen Haynes Regarding Proposed Settlement Agreement of Parties," and request that you insert Judge Haynes' Response and Position Statement as a separate portion of the Joint Motion. Please insert my signature as I have shown, reflecting that I am signing only for Judge Haynes' Response and Position Statement.

Thank you.

Danny

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From: Danny Shadid <[danny@shadidlaw.com](mailto:danny@shadidlaw.com)>

Sent: Thursday, February 15, 2024 6:50 PM

To: 'cpowell@spencerfane.com' <[cpowell@spencerfane.com](mailto:cpowell@spencerfane.com)>; 'Ferate, AJ' <[AJFerate@spencerfane.com](mailto:AJFerate@spencerfane.com)>; Jason  
Leckerman' <[leckermanj@ballardspahr.com](mailto:leckermanj@ballardspahr.com)>

Cc: 'steve haynes' <[judgehaynes@gmail.com](mailto:judgehaynes@gmail.com)>; 'Amber@Shadidlaw.com' <[Amber@Shadidlaw.com](mailto:Amber@Shadidlaw.com)>

Subject: RE: KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

Counsel

I am in the process of proofing Judge Haynes' Position Statement for inclusion in the Joint Motion to be filed tomorrow. I should have it to you by mid-morning tomorrow.

Thanks.

Danny

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**From:** Danny Shadid <[danny@shadidlaw.com](mailto:danny@shadidlaw.com)>

**Sent:** Friday, February 9, 2024 11:12 AM

**To:** 'cpowell@spencerfane.com' <[cpowell@spencerfane.com](mailto:cpowell@spencerfane.com)>; 'Ferate, AJ' <[AJFerate@spencerfane.com](mailto:AJFerate@spencerfane.com)>; 'Jason Leckerman' <[leckermanj@ballardspahr.com](mailto:leckermanj@ballardspahr.com)>

**Cc:** 'steve haynes' <[judgehaynes@gmail.com](mailto:judgehaynes@gmail.com)>; 'Amber@Shadidlaw.com' <[Amber@Shadidlaw.com](mailto:Amber@Shadidlaw.com)>

**Subject:** KIMIESHA HILL v. TOWN OF VALLEY BROOK, et al.

Counsel:

Given the differing positions of Judge Haynes and all other defendants, as well as his differing position with plaintiffs, I will be drafting Judge Haynes' portion of the Joint Motion to be filed in accordance with the Court's Order of this day, and will send it to you for inclusion in the Joint Motion.

Thank you.

Danny

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